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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

DISABILITY RIGHTS OREGON;
METROPOLITAN PUBLIC DEFENDERS
INCORPORATED; and A.J. MADISON,

Plaintiffs,

v.

SEJAL HATHI, in her official capacity as
Director of Oregon Health Authority; and
SARA WALKER, in her official capacity as
Superintendent of the Oregon State Hospital,

Defendants.

Case No.: 3:02-cv-00339-AN (Lead Case)

DECLARATION OF ALEX VAN
RYSSELBERGHE IN SUPPORT OF
HOSPITALS' RESPONSE TO DISABILITY
RIGHTS OREGON'S AMICUS BRIEF
REGARDING MOTIONS TO INTERVENE
AND THIRD-PARTY STANDING

DECLARATION OF ALEX VAN
RYSSELBERGHE IN SUPPORT
OF PLAINTIFFS' RESPONSE TO
DISABILITY RIGHTS OREGON'S
AMICUS BRIEF
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JAROD BOWMAN; and JOSHAWN
DOUGLAS SIMPSON,

Plaintiffs,

v.

SARA WALKER, Superintendent of the
Oregon State Hospital, in her individual and
official capacity; SEJAL HATHI, Director of
the Oregon Health Authority, in her individual
and official capacity,

Defendants.

Case No.: 3:21-cv-01637-AN (Member Case)

LEGACY EMANUEL HOSPITAL &
HEALTH CENTER d/b/a UNITY CENTER
FOR BEHAVIORAL HEALTH; LEGACY
HEALTH SYSTEM; PEACEHEALTH;
PROVIDENCE HEALTH & SERVICES –
OREGON; and ST. CHARLES HEALTH
SYSTEM,

Plaintiffs,

v.

SEJAL HATHI, in her official capacity as
Director of Oregon Health Authority,

Defendant.

Case No.: 6:22-cv-01460-MO (Member Case)

I, Alex Van Rysselberghe, declare:

1. I am one of the attorneys for Plaintiffs Legacy Emanuel Hospital & Health Center D/B/A Unity Center for Behavioral Health; Legacy Health System; PeaceHealth; Providence Health & Services – Oregon; And St. Charles Health System. I am over eighteen years of age, and this declaration is based on my personal knowledge.

DECLARATION OF ALEX VAN
RYSSELBERGHE IN SUPPORT
OF PLAINTIFFS' RESPONSE TO
DISABILITY RIGHTS OREGON'S
AMICUS BRIEF
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2. Attached as **Exhibit 1** is a true and accurate copy of a memorandum and temporary rule promulgated by OHA amending OAR 309-035-0163 to prioritize aid-and-assist admissions, and de-prioritize civil commitment admissions, in long-term residential treatment facilities and homes.

3. Attached as **Exhibit 2** is a true and accurate copy a transcript of the oral argument that occurred before the Ninth Circuit on May 8, 2024, in the appeal in this case, *Legacy v. Patrick Allen*, Case No. 23-35511. A video recording of the argument is also available at <https://www.youtube.com/watch?v=idwUFnMSRLo>.

I HEREBY DECLARE THAT THE ABOVE STATEMENTS ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.

DATED: February 4, 2025.

/s/ Alex Van Rysselberghe
Alex Van Rysselberghe